

Mr. Steven R. Ritchie  
Acting Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Room 252-35  
Sacramento, CA 95814

Attn: Campbell Ingram

Dear Mr. Ritchie:

This letter responds to your memoranda of November 23, 1999, and December 7, 1999, requesting CALFED member agency comments on the Draft Response to Comments Document (RTCD) and the Summary of Changes Document for the CALFED Programmatic EIS/EIR. As a cooperating agency, Western Area Power Administration has reviewed these documents as they relate to our particular area of expertise, hydroelectric power marketing.

The programmatic nature of the CALFED PEIS/EIR makes it difficult to narrow the broad range of impacts described. It is similarly difficult to determine which specific mitigation measures are appropriate at this level of decision-making. It is our understanding that analysis of specific impacts and identification of mitigation measures will occur in tiered documents for site-specific projects. CALFED's plan to take an adaptive management approach to determining the nature and extent of these future projects makes a similar adaptive management approach to analysis of and mitigating for hydropower-related impacts prudent. This will also provide assurances to satisfy hydropower stakeholders that appropriate and effective mitigation will in fact occur. Since a process for adaptively managing hydropower impacts has not been defined in the CALFED PEIS/EIR, Western plans to continue to work with CALFED staff over the next few weeks to fill in this missing element.

Comments on Draft Response to Comments Document

Until the adaptive management process has been defined for hydropower-related impacts, we cannot complete our recommended revisions to the responses to comments as presented in the November 99 RTCD. We believe Section 7.9 Power Production and Energy should begin with an introductory paragraph that references the adaptive management process. Once this introductory paragraph has been added, the appropriate responses to comments can be tied to this paragraph. The new introductory paragraph, in turn, would tie back to CALFED PEIS/EIR by referencing the proposed new paragraphs to be added to Sections 7.9.7.1 and 7.9.11 as described in the December 1999 Summary of Changes to the CALFED PEIS.

Proposed language for the introductory paragraph to Section 7.9 of the RTCD is as follows:

Comments related to Power Production and Energy reflect stakeholder concerns about impacts to the availability of hydropower as a peaking resource, and potential effects to power costs with accompanying economic and socioeconomic effects as a result of CALFED decisions and actions. CALFED recognizes hydropower generation as a legitimate project purpose, and supports the objectives for hydropower generation and marketing expressed in State and Federal law. These can be summarized as follows: (1) to assist with State and Federal water project capital debt repayment; (2) to provide energy to move water through the SWP and CVP without excessive transportation costs; and (3) to aid in meeting regional power loads while maintaining reliability of the power grid at reasonable costs to consumers. CALFED acknowledges that mitigating for the impacts and effects of its actions and decisions on hydropower resources may be necessary so these objectives can continue to be met. Many of the comments call for more specific information than appropriate in a programmatic environmental review document, but the issues raised can and will be addressed in subsequent project-level studies. The environmental documentation for project-level studies will tier off of this programmatic EIS/EIR. As such, all subsequent tiered documents must consider how the impacts and effects of the individual project fit within, and build upon, the entire array of CALFED and related actions. Proposed strategies for mitigation of impacts or reduction of adverse effects identified in subsequent project-level studies will consider the cumulative impact or effect of all CALFED and related actions. Such a process will require an adaptive management approach to the identification and implementation of mitigation or adverse effect reduction strategies.

#### Comments on Summary of Changes Document

Western has reviewed the proposed new paragraphs to be inserted in Section 7.9.7.1 and Section 7.9.11 and concur that these move the document toward addressing some of the concerns raised by hydropower stakeholders. Western concurs that these paragraphs should be added, with the following refinements in the proposed text:

Section 7.9.7.1, page 7.9-15, third paragraph under All Regions/All Programs:

The identification of maximum effects and impacts also reflects the encompassing nature of the CALFED alternatives. Each alternative may include a number of discrete actions. As noted earlier, individual actions (along with their corresponding impacts and effects) will be examined in subsequent project-level studies. The environmental documentation for project-level studies will tier off this programmatic EIS/EIR. As such, all subsequent tiered documents ~~will need to~~ must consider how the impacts and effects of the individual project fit within, and build upon, the entire array of CALFED and related actions ~~within the CALFED alternative~~. Proposed strategies for mitigation of impacts or reduction of adverse effects identified in subsequent project-level studies will consider the cumulative impact or effect of all CALFED and related actions ~~within the CALFED alternative~~. Such a process ~~may~~ will require an adaptive management approach to the identification and implementation of mitigation or adverse effect reduction strategies.

Section 7.9.11, page 7.9-34, last paragraph of Section 7.9.11:

As noted earlier, individual actions (along with their corresponding impacts and effects) will be examined in subsequent project-level studies. The environmental documentation for project-level studies will tier off of this programmatic EIS/EIR. As such, all subsequent tiered documents ~~will need to~~ must consider how the impacts and effects of the individual project fit within, and build upon, the entire array of CALFED and related actions within the CALFED alternative. Proposed strategies for mitigation of impacts or reduction of adverse effects identified in subsequent project-level studies will consider the cumulative impact or effect of all CALFED and related actions within the CALFED alternative. Such a process ~~may~~ will require an adaptive management approach to the identification and implementation of mitigation or adverse effect reduction strategies.

Western appreciates this opportunity to work with CALFED in refining the RTCD and Final PEIS/EIR. Within the next few days, we will submit suggested language for the adaptive management process for hydropower-related impacts, effects and mitigation measures, and specific comments on the RTCD.

Sincerely,

Nancy Werdel  
Environmental Manager